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The Honorable William V. Roth, Jr.
United States Senate

Dear Senator Roth:

This is in response to your letter of September 21, in which you expressed several concerns regarding the conclusions and recommendations presented in a summary of our recent report, "The National School Lunch Program--Is It Working?". A copy of the main report, and our statement before the Senate Select Committee on Nutrition and Human Needs, are enclosed for your review. They provide greater detail on the issues raised by your constituents.

While we share your concerns about the cost of evaluating the School Lunch Program's health impact, we believe that the Congress would be ill-advised to presume that the program is performing as intended. The program's current Type A pattern is designed to provide one-third of the daily diet for 10- to 12-year-old children, yet it is fed to all children--irrespective of age or nutritional need. We have little doubt that the lunch is benefiting some children, but, as noted in our report, there is an inherent danger that it is also causing undesired side-effects. We believe that USDA, assisted by HEW, can design an evaluation of the program's health impact that will be relatively inexpensive. HEW already has the ability to evaluate nutritional status, and the techniques for isolating the effects of the program lunch from external influences are well established. (See Chapter 4, p. 40).

In regards to your concern that the report over emphasizes the lack of mandatory requirements for nutrition teaching, our intentions were to inform the Congress that legislation prohibits the program from imposing such requirements. The effectiveness of nutrition education activities was not addressed in our work. (See p. 53).

In regards to your constituents' opinions that "the Type A pattern cannot be blamed for obesity", we wish to point out that our report does not state that the program is causing obesity (see pp. 45-46). We do, however, above and beyond the influence of exercise and home diet, express concerns for the program's potential to increase the risk of such adverse side-effects. We are convinced that the Type A pattern, as currently structured, cannot be relied upon to provide one-third of the recommended dietary allowances (RDA) for schoolchildren. And, given that the program feeds both overweight and underweight children, we are not sure that "one-third RDA" or any other "standard lunch" is the best choice for complementing a schoolchild's home diet. Some variation of caloric intakes may be needed. For these reasons we have recommended that USDA, with assistance from HEW, conduct a study to determine the nutritional standards needed for the program to best safeguard schoolchild health. We believe that the experience and data resources obtained in HEW's "Health and Nutrition Examination Survey" will provide a valuable contribution to this effort. (See Chapter 3, p. 38 and Chapter 4, p. 40).

We agree, on a conceptual basis, with your constituents' concerns that "an alternative meal standard would be more complicated" and that other actions have "merit as a practical, less expensive way to expand program participation and reduce food waste". However, because of the nutritional concerns discussed earlier, we believe that changes in the Type A pattern itself are needed. Chapter 5 of our report describes the rigidity of the Type A pattern and its detrimental effect on program performance. It is important, however, to distinguish between meal patterns in general, and the Type A pattern in particular. The Type A pattern is rigidly specified, both in food components and in portion-sizes. The present standard is now undergoing revisions by USDA. We believe that the Secretary should prescribe meal regulations in terms of nutritional standards, supplemented by one or more patterns conforming to these standards. Compliance with either would be deemed to fulfill the Federal requirement. Our view is that such an option would encourage flexibility in menu planning, and attract more children into the program. (See p. 55).

The basis for our estimate that program food costs could be reduced by more than \$100 million is explained in Chapter 8 of the report. We recommended that the Secretary of Agriculture examine approaches and implement procedures for improving the food procurement economies of small and

medium-sized school systems. USDA has indicated that it is currently undertaking actions on this matter and will be reporting on its proposals in the near future. (See p. 123).

If we can be of further assistance, please feel free to contact us.

Sincerely,

R.F.KELLER

Acting Comptroller General
of the United States

Enclosures

cc: Mr. Keller (OCG)
Mr. Fitzgerald (OCR)
Mr. Havens (PAD)
Mr. Crowther (PAD)
Mr. Myers (PAD)
Mr. Delfico (PAD)
Mr. Sykes (PAD)
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